IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

In re:) Case No. 16-13782
)
Christopher & Laurie Kaufmann,) Judge Jessica E. Price Smith
)
Debtors.) Chapter 7 Case

TRUSTEE'S LIMITED OBJECTION TO MOTION OF SELENE FINANCE, LP, FOR RELIEF FROM STAY AND ABANDONMENT

David O. Simon, the Trustee in this case, hereby submits this limited objection to the Motion of Selene Finance, LP, for Relief from Stay and Abandonment and, in support of this objection, states as follows:

- 1. The trustee may have an opportunity to achieve a "short sale" of the property which is the subject of the motion, which would include a meaningful carve out for the benefit of this estate and its creditors.
- 2. As a result, the trustee has no objection to movant being granted relief from the stay of §362 of the Bankruptcy Code, but the trustee declines to abandon the property at this time.

WHEREFORE, the trustee prays that this limited objection be sustained and the motion be granted only as to relief from stay.

/s/ David O. Simon

David O. Simon, Trustee 55 Public Square, Suite 2100 Cleveland, OH 44113-1902 (216) 621-6201; Fax; (888) 467-4181 david@simonlpa.com

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing limited objection was electronically served this 25th day of August, 2016, upon:

- Keith L. Borders kblaw123@gmail.com, kblaw123@ecf.courtdrive.com
- Joel K. Jensen nohbk@lsrlaw.com
- Chrysostomos E. Manolis <u>cmanolis@logs.com</u>
- United States Trustee (Registered address)@usdoj.gov

/s/ David O. Simon

David O. Simon